

Federal Defenders OF NEW YORK, INC.

David E. Patton
Executive Director
and Attorney-in-Chief

52 Duane Street-1
Tel: (212) 417-8749

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/18/2019

Attorney-in-Charge

November 15, 2019

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Application GRANTED. The status conference currently scheduled for November 19, 2019, is hereby adjourned to January 9, 2020, at 11:00 a.m. The Court finds that the ends of justice served by excluding the time between today and January 9, 2020, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h)(7)(A). It is hereby ORDERED that the time between today and January 9, 2020, is excluded.

Dated: November 18, 2019

New York, New York

Re: United States v. Joseph Bagaglia,
19 Cr. 342 (LGS)



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I write with the consent of the government to request an adjournment of the November 19, 2019 status conference in this matter. A second adjournment is necessary because Mr. Bagaglia remains unable to travel following his lapidus fusion and bunionectomy surgery on August 23, 2019. Mr. Bagaglia's doctors explain that he is experiencing delayed healing due to muscle weakness, pain, and not comprehending limited weight bearing on the foot. They have advised the family that he should not travel to New York before January.

I therefore request that the Court reschedule the November 19, 2019 conference to January 13, 14, or 17, 2020. In the meantime, I expect to submit a written memorandum to the government requesting the reduction of the charges against Mr. Bagaglia.

The government consents to the requested adjournment and seeks the exclusion of time under the Speedy Trial Act. We consent to the exclusion of time until the next conference under 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

/s/
Clay H. Kaminsky
Assistant Federal Defender
Federal Defenders of New York
(212) 417-8749

cc: AUSA Ni Qian